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Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;

16 OTTOMOTTO LLC; OTTO TRUCKING

17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL**

19 the

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Uber Technologies, Inc. and
7 Ottomotto LLC’s Administrative Motion to File Under Seal (the “Administrative Motion”). The
8 Administrative Motion seeks an order sealing highlighted portions of Defendants’ Opposition to
9 Waymo’s Motion for Leave to File Amended List of Elected Trade Secrets, Supplemental Expert
10 Reports, and Revised Witness and Exhibit Lists (“Uber’s Opposition”), as well as the entirety of the
11 Burnette Declaration and Exhibits 1-3, 5, and 9-11 to the Chang Declaration.

12 3. The portions of Uber’s Opposition and Exhibits 2-3 marked in red boxes and the green
13 highlighted portions of Exhibit 1, as well as the entirety of the Burnette Declaration and Exhibit 9
14 contain or refer to trade secrets and confidential business information, which Waymo seeks to seal.

15 4. Uber’s Opposition (portions marked in red boxes in version filed herewith), the
16 Burnette Declaration (entire document), Exhibit 1 (portions highlighted in green in version filed
17 herewith), Exhibits 2-3 (portions marked in red boxes in versions filed herewith), and Exhibit 9 (entire
18 document) contain, reference, and/or describe Waymo’s asserted trade secrets, including as
19 misappropriated by Defendants. The information Waymo seeks to seal includes the confidential
20 design and functionality of Waymo’s proprietary autonomous vehicle system, including its source
21 code and LiDAR designs, which Waymo maintains as secret. I understand that these trade secrets are
22 maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo’s
23 business (Dkt. 25-31). The public disclosure of this information would give Waymo’s competitors
24 access to descriptions of the functionality or features of Waymo’s autonomous vehicle system. If such
25 information were made public, I understand that Waymo’s competitive standing would be
26 significantly harmed.

27 5. Exhibit 1 (portions highlighted in green in version filed herewith) and Exhibit 9 (entire
28 document) additionally contain, reference, and/or describe Waymo’s highly confidential and sensitive

1 business information. The information Waymo seeks to seal regards confidential details regarding
 2 Waymo's business, including details about potential partnerships and product release details. I
 3 understand that this confidential business information is maintained by Waymo as secret. The public
 4 disclosure of this information would give Waymo's competitors access to Waymo's business strategy
 5 for its autonomous vehicle system. If such information were made public, I understand that Waymo's
 6 competitive standing would be significantly harmed.

7 6. Waymo's request to seal is narrowly tailored to those portions of Uber's Opposition,
 8 the Burnette Declaration, and Exhibits 1-3 and 9 that merit sealing.

9
 10 I declare under penalty of perjury under the laws of the State of California and the United
 11 States of America that the foregoing is true and correct, and that this declaration was executed in San
 12 Francisco, California, on October 30, 2017.

13 By /s/ Felipe Corredor

14 Felipe Corredor
 15 Attorneys for WAYMO LLC

16
 17 **ATTESTATION**

18 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
 19 document has been obtained from Felipe Corredor.

20
 21 By: /s/ Charles K. Verhoeven
 22 Charles K. Verhoeven